

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

CIVIL ACTION NO.: 2:22-cv-00232-JDL

WILLIAM MORGAN)
)
Plaintiff)
)
v.)
)
CMG MORTGAGE, INC. d/b/a)
CMG FINANCIAL)
)
Defendant)

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF’S COMPLAINT**

Now comes Defendant CMG MORTGAGE, INC. d/b/a CMG FINANCIAL (“Defendant”), by and through the undersigned, and moves pursuant to Fed. R. Civ. P. 6(b) for an extension of time allowed Defendant to answer or otherwise plead to the Complaint. In support of its Motion Defendant further states as follows:

1. Plaintiff filed the Complaint with this Court on July 26, 2022.
2. Defendant was served on August 15, 2022. Defendant’s deadline to answer or otherwise respond to the Complaint is currently September 6, 2022.
3. Prior to that date, counsel for both parties agreed to an extension of the deadline to answer or otherwise respond. Defendant had requested additional time both because of the need to investigate the numerous allegations in the 93-paragraph Complaint and because of previously-scheduled unavailability of counsel.
4. This Motion is not interposed for the purposes of delay, this is Defendant’s first request for an extension of time, and no party will be unduly prejudiced if the Court grants this Motion.

5. Counsel for Plaintiff has consented to an extension of the deadline up to and including September 27, 2022.

WHEREFORE, Defendant requests that the time allowed for it to answer or otherwise plead with respect to the Complaint in this matter be extended up to and including September 27, 2022, and that the Court provide such further relief as it deems just and proper.

Dated: September 19, 2022

Respectfully submitted,

By: /s/ Andrew J. Schaefer

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Attorneys for Defendant CMG Mortgage, Inc.
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CERTIFICATION

I hereby certify that on September 19, 2022, the foregoing motion was filed through the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filing, or by First Class Mail, where appropriate.

/s/ Andrew J. Schaefer

Andrew J. Schaefer, Esq.